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Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, D.C. 20554

Federal Communications Commission
Office of the Secretary

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Re: *Telecommunications Carriers Eligible to Receive Universal Service Support; Boomerang Wireless, LLC's Petition for Limited Designation as an Eligible Telecommunications Carrier in Alabama, Connecticut, Delaware, the District of Columbia, Florida, Maine, New Hampshire, New York, North Carolina, Tennessee and Virginia, WC Docket No. 09-197*

Dear Ms. Dortch:

Boomerang Wireless, LLC ("Boomerang") submits the following information in support of its request to be designated as an Eligible Telecommunications Carrier for the purpose of providing Lifeline service in the above-captioned states. This information demonstrates that Boomerang is a careful Lifeline provider, and that approval of its petition would expand an exemplary program and help bridge the broadband gap for more low income individuals.

10 MB of data provided free: Boomerang offers 10 MB of data free to *all* subscribers as part of its basic Lifeline Plan.¹ Boomerang likewise provides all subscribers (at no additional charge) phones that enable Internet access, including sending emails and basic web access. Together, the device and data package that Boomerang provides enable its Lifeline customers to take advantage of Internet connectivity using only their basic Lifeline service.

Boomerang Provides Customers with Internet Training: [Begin confidential treatment] [REDACTED] [End confidential treatment]

Data top-up: [Begin confidential treatment] [REDACTED]

¹ Boomerang is in the process of a web update and redesign that will reflect this offering to consumers.

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[REDACTED] [End confidential treatment] Currently, subscribers have the option to pay \$5 for 100 MB data or \$10 for 500 MB of additional data. [Begin confidential treatment] [REDACTED]

[REDACTED] [End confidential treatment]

Differences between Ready Wireless and Boomerang: Ready Wireless LLC and Boomerang Wireless LLC are subsidiaries of HH Ventures, a holding company. Ready Wireless is a provider of wholesale prepaid wireless phone service, serving as the MVNE operating company for the corporate family. Ready Mobile PCS, a subsidiary of Ready Wireless, is the consumer brand that provides prepaid phone and mobile broadband service. Boomerang, a subsidiary of HH Ventures, is the entity within the family of companies that is the approved ETC. enTouch Wireless is a Boomerang brand through which the Lifeline program is administered.

Ready Mobile launched its prepaid service in 2006. Through this initial venture, Ready Wireless learned important lessons about the needs of low income consumers. For example, Ready Wireless found that its customers i) want to pay only for what they use; ii) want to pay using cash; iii) want all the same features and functions on their phone as other consumers; iv) want flexibility in how they use their plans; and v) want good customer service. The demographic profile of customers for both Ready Mobile and Boomerang is in fact very similar, and Boomerang now applies these important lessons to better serve its Lifeline subscribers. The difference between the customers for the two companies is that Ready Mobile customers do not have access to the Lifeline service discounts.

Ready Mobile also has a cost effective pre-paid broadband product called ReadyBroadband. The device allows up to 5 concurrent Wi-Fi connections to a national carrier network, and allows customers to pay for what they use. The difference in price between Ready Mobile's data plans for a phone and Ready Mobile's "ReadyBroadband" internet plans for a MiFi device is largely due to the difference in technology and how customers typically use these plans.

Partnerships with health organizations: Boomerang has entered into marketing partnerships with local Medicaid Managed Care Organizations ("MCOs"). The MCOs wish to establish a reliable communication bridge with their members, many of whom are Lifeline eligible but not necessarily using the program. The MCOs help make their members aware of the enTouch Wireless program. As part of this partnership, Boomerang provides additional value: Boomerang provides the MCO with free texts (10/member/month) and free minutes (10/member/month) to use to communicate directly with consumers signed up through the MCO through designated healthcare-related numbers. Subscribers can use this free credit for communicating with their health care providers, including contacting the "Call a Nurse" program, contacting their pharmacy, and making doctors' appointments. [Begin confidential treatment] [REDACTED]

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[Redacted]
[Redacted] [End confidential treatment]

Efforts to understand customer base: As Boomerang has previously discussed,² it has undertaken substantial efforts to better understand its subscribers and their needs. As part of these ongoing efforts, Boomerang performed an informal experiment to see how much data subscribers would use if given unlimited access. For the basic Lifeline plans, a subscriber's data shuts off after the 10 free MB are used. For this experiment, Boomerang chose around 5,000 - 6,000 consumers, mostly in Washington, and left their data on after 10 MB were used. Boomerang found from this experiment that those consumers used on average 45 - 50 MB of data per month using the feature phone provided to them. This usage indicated to Boomerang that customers will go well beyond the 10 MB if it were provided. [Begin confidential treatment]

[Redacted]
[Redacted] [End confidential treatment]

Free devices offered: Boomerang offers subscribers the best device that it can get at a price that works for the Lifeline benefits. The devices offered depend on the availability and price in aftermarket. Boomerang offers subscribers basic smartphones in California, and has been able to offer some smartphones outside of California.

All free devices are data enabled, and include feature phones and QWERTY phones. On these devices, subscribers can use basic internet service to send and receive email, visit webpages, fill out job applications, and search for a doctor.

[Begin confidential treatment] [Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted] [End confidential treatment]

[Redacted] [End confidential treatment]

California plan: Although Boomerang offers a number of Lifeline plans in California, including paid plans, all customers have chosen to be on the free plan. Boomerang has found that customers choose the free plans and then may choose to top-up to the other California plans. At this time, Boomerang has not analyzed how many of its customers choose to top-up to the next plan. Boomerang currently has 41,000 Lifeline subscribers in California.

Extensive duplicate elimination process: [Begin confidential treatment] [Redacted]
[Redacted]

² See Notice of Ex Parte Presentation of Boomerang Wireless, LLC, WC Docket Nos. 09-197, 11-42, at 3 (May 23, 2014)

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[REDACTED]

[REDACTED]

[REDACTED] [End confidential treatment]

Reaching a remote customer base: Boomerang sets itself apart as a Lifeline provider by focusing on eligible consumers who are not already subscribed to the Lifeline program, rather than consumers already subscribed with another carrier. Specifically, Boomerang focuses on Tier 3 and Tier 4 cities and smaller communities where there has not been a great deal of marketing for Lifeline. Boomerang also often targets remote tribal lands.

Most importantly, Boomerang's commitment to bringing Lifeline to more remote areas is what the Lifeline program is all about – ensuring that individuals who would not otherwise have access to phone service are provided the opportunity. Approval of Boomerang's ETC Petition would allow Boomerang to continue its efforts to reach these underserved populations.

If you have any questions, please do not hesitate to contact me at (202) 730-1346, or bstrandberg@hwglaw.com.

Respectfully submitted,



Brita D. Strandberg
Counsel to Boomerang Wireless, LLC

cc: J. Lechter